

## 7023 Horn v Dixie et al scheduling expert deps

From: Eric T. Boron

Sent: Wed, Nov 15, 2017 at 5:16 pm

To: Jeffrey Benjamin

Cc: Hanoch Sheps

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Jeff –

Thank you for your patience in awaiting a response to your November 7 scheduling inquiry (below). I have conferred with counsel for Dixie and our disclosed experts, and taking into account prior potential dates of availability you have provided as to yourself and plaintiffs' disclosed experts, the following expert deposition schedule is proposed:

Dec 1 – Dr. Graham at Messner, Reeves' NYC office (start time TBD)

Dec 4 - Dr. Zaporowski at my Buffalo office (start time TBD)

Dec 12 – Charles Amodio and Dr. Orser at Messner Reeves' NYC office (start time TBD)

Presently we are not scheduling depositions of Mr. Gobbell or Ms. Voie, although we reserve our right to schedule the same after conducting the depositions of Dr. Graham and Dr. Zaporowski.

Formal amended deposition notices for Dr. Graham and Dr. Zaporowski will be served on your office once you confirm the dates, locations and start times.

Notwithstanding the above, kindly advise me and Hanoch Sheps of the status of plaintiffs' remaining owed production. Thank you.

Regards,

Eric T. Boron, Esq.

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**From:** Jeffrey Benjamin [mailto:[jbenjamin@nyfraudlaw.com](mailto:jbenjamin@nyfraudlaw.com)]

**Sent:** Tuesday, November 07, 2017 3:30 PM

**To:** Eric T. Boron

**Cc:** Hanoch Sheps

**Subject:** Deft expert deps

Gentlemen please get back to me with the availability of your experts for depositions. We have until 12/29 and that will come very quickly.

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